

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

FUND LIQUIDATION HOLDINGS LLC, as assignee
and successor-in-interest to FrontPoint Asian Event
Driven Fund L.P., on behalf of themselves and all oth-
ers similarly situated,

Plaintiff,

v.

CITIBANK, N.A., BANK OF AMERICA, N.A.,
JPMORGAN CHASE BANK, N.A., THE ROYAL BANK
OF SCOTLAND PLC, UBS AG, BNP PARIBAS, S.A.,
OVERSEA-CHINESE BANKING CORPORATION
LTD., DEUTSCHE BANK AG, CREDIT AGRICOLE
CORPORATE AND INVESTMENT BANK, CREDIT
SUISSE AG, STANDARD CHARTERED BANK, DBS
BANK LTD., UNITED OVERSEAS BANK LIMITED,
AUSTRALIA AND NEW ZEALAND BANKING
GROUP, LTD., THE BANK OF TOKYO-MITSUBISHI
UFJ, LTD., THE HONGKONG AND SHANGHAI
BANKING CORPORATION LIMITED, AND JOHN
DOES NOS. 1-50,

Defendants.

Docket No.: 1:16-cv-05263-AKH

**NOTICE OF DEFENDANTS' JOINT
MOTION TO DISMISS THE THIRD
AMENDED CLASS ACTION
COMPLAINT**

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that the undersigned, attorneys for Defendants Bank of America, N.A., The Royal Bank of Scotland plc, UBS AG, BNP Paribas, S.A., Oversea-Chinese Banking Corporation Ltd., Deutsche Bank AG, Credit Agricole Corporate and Investment Bank, Credit Suisse AG, Standard Chartered Bank, DBS Bank Ltd., United Overseas Bank Limited, Australia and New Zealand Banking Group, Ltd., The Bank of Tokyo-Mitsubishi UFJ, Ltd., and The Hongkong and Shanghai Banking Corporation Limited in the above-referenced matter, request oral argument and will move this Court, before the Honorable Alvin K. Hellerstein, United States District Judge for the Southern District of New York, 500 Pearl Street, New York, New York, at a date and time to be determined by this Court, for an order pursuant to Rules 12(b)(1), 12(b)(2), and 12(b)(6) of the Federal Rules of Civil Procedure dismissing with prejudice, in whole or in part, the claims asserted in the Third Amended Class Action Complaint.

The grounds for this motion are that the Third Amended Complaint should be dismissed for lack of subject matter jurisdiction and failure to state a claim upon which relief can be granted as to all Defendants, and for lack of personal jurisdiction as to certain Defendants.¹ The specific grounds for Defendants' motion to dismiss are set forth in the accompanying Memorandum of Law in Support of Defendants' Joint Motion to Dismiss the Third Amended Class Action Complaint, the accompanying declarations filed contemporaneously therewith, and the exhibits attached thereto.

¹ Those Defendants are The Royal Bank of Scotland plc, UBS AG, BNP Paribas, S.A., Oversea-Chinese Banking Corporation Ltd., Credit Agricole Corporate and Investment Bank, Credit Suisse AG, Standard Chartered Bank, DBS Bank Ltd., United Overseas Bank Limited, Australia and New Zealand Banking Group, Ltd., The Bank of Tokyo-Mitsubishi UFJ, Ltd., and The Hongkong and Shanghai Banking Corporation Limited.

Dated: New York, New York
November 15, 2018

RESPECTFULLY SUBMITTED,

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